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TREASURE ISLAND
SSIC NO. 5090.3.A

GEOMATRIX

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November 2, 1999
Project 005553.004.0

Mr. Ernesto Galang
Engineering Field Activity, West
Naval Facilities Engineering Command
Bldg. 208, 2nd Floor
900 Commodore Drive
San Bruno, California 94066-2402

Subject: Site 12 Removal Site Evaluation and Action Memorandum for Time-Critical Removal of Lead-Contaminated Soil near Building 1133
Naval Station Treasure Island
San Francisco, California

Dear Mr. Galang:

This letter presents the results of a review of *Site 12 Removal Site Evaluation and Action Memorandum for Time-Critical Removal of Lead-Contaminated Soil near Building 1133* (Draft Action Memorandum), which was prepared by Tetra Tech EM Inc. (TtEMI), on behalf of the Department of the Navy Engineering Field Activity West (the Navy). The Draft Action Memorandum presents the basis for the time-critical removal of lead-affected soil in the vicinity of Building 1133 as well as describes the extent of the excavation and associated costs. This review was performed by Geomatrix Consultants, Inc. (Geomatrix) on behalf of the City and County of San Francisco, Mayor's Office, Treasure Island Project (the City). Our comments on the Draft Action Memorandum are summarized below:

- Section 5.1 describes the extent of the excavation, which is shown in Figure 3. However, the text refers to an "initial excavation," but only the extent of the final excavation is shown in Figure 3. In addition, the basis for extending the excavation to the south is not discussed. This section should be expanded and the figure revised to explain that the initial investigation extended to the southern edge of Building 1133, but was extend southward based on the results of trenching activities behind Building 1125.

- Section 5.1 also states that "No confirmation sampling of the sidewalls and bottom of the excavation is planned (however) If debris was noted at the edge of the excavation, a field decision was made to perform confirmation sampling to ensure that lead concentrations do not exceed the 400 mg/kg lead PRG." The text does not state whether any confirmation samples were actually collected. If that is the case, then that should be clearly stated in the text. However, it is our understanding that some confirmation samples were collected based on statements made by Navy representatives at the September 21, 1999, RAB meeting. If that is the case, then the locations of these

samples and the analytical results should be discussed in the text, summarized in a table, and shown on Figure3.

- We suggest inserting the word "potential" before the word "threat" in Section 6.0.

If you have any questions about these comments, please call me at (510) 663-4232.

Sincerely yours,

GEOMATRIX CONSULTANTS, INC.

Gregory P. Brorby, DABT
Principal Toxicologist

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GPB\pp

cc: Martha Walters, San Francisco Redevelopment Agency
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